

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF NEW YORK**

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:  
COMPASS-CHARLOTTE 1031, LLC, :

Plaintiff, :

v. :

Case No. 24-cv-00055 (MAD/CJH)

PRIME CAPITAL VENTURES, LLC, *et al.* :

Defendants. :  
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PAUL A. LEVINE, as Receiver of Prime Capital  
Ventures, LLC, :

Third-Party Plaintiff, :

v. :

KRIS D. ROGLIERI et al., :

Third-Party Defendants. :  
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**DECLARATION OF PIETER VAN TOL**

Pieter Van Tol, pursuant to 28 U.S.C. § 1746, declares as follows:

1. I am a partner with the firm of Hogan Lovells US LLP, and this firm is counsel for Prime Capital Ventures, LLC and Third-Party Defendants Kris D. Roglieri, Kimberly Humphrey (a/k/a Kimmy Humphrey), Prime Commercial Lending, LLC, Commercial Capital Training Group, The Finance Marketing Group, National Alliance of Commercial Loan Brokers LLC, and FUPME, LLC in the above action. I am admitted to the bar of the State of New York and to practice before this Court.

2. I submit this declaration in response to a motion (the “Motion”) by the receiver in this case (the “Receiver”) to extend the requested attachment to additional assets. The purpose of this declaration is to provide documents to the Court in connection with the Motion.

3. Annexed hereto as **Exhibit A** is a true and correct copy of a letter sent to the Receiver on February 13, 2024.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Executed on February 13, 2024

/s/ Pieter Van Tol  
Pieter Van Tol